

## REMARKS

The following remarks are responsive to the Office Action mailed June 29, 2005.

35 USC §102 Rejections

Claims 1 and 13 are rejected under 35 U.S.C. §102(e) as being anticipated by U.S. Patent No. 6,713,358 (Chau et al). Claims 1-6 and 13-19 are rejected under 35 U.S.C. §102(e) as being anticipated by U.S. Patent No. 6,894,353 (Samavedam et al). Claims 1 and 13 are presently amended to reflect that the silicon-nitride layer is formed using a physical vapor deposition (PVD) process. In Chau, the silicon-nitride layer is formed using a plasma enhanced chemical vapor deposition (PECVD) process (col. 2 lines 41-50), whereas Samavedam deposits a Tantalum-Silicon-Nitride layer (TaSiN) using a PVD process (Abstract), but not a Silicon-Nitride layer, as claimed in claims 1 and 13.

For convenience, Applicant includes in this response a definition of PVD as compared to CVD:

**"Physical vapor deposition (PVD) is a technique in semiconductor device fabrication used to deposit thin films of various materials onto various surfaces (e.g., of semiconductor wafers) by physical means, as compared to chemical vapor deposition." (http://www.answers.com/topic/physical-vapor-deposition?hl=chemical&hl=vapor&hl=deposition)**

Furthermore, one of ordinary skill in the art will appreciate that TaSiN (used in Samavedan) is not the same compound as SiN (claimed by Applicant). Therefore, claims 1 and 13 as presently amended are not anticipated by Chau or Samavedan.


Accordingly, it is respectfully asserted by Applicant that claims 1-6 and 13-19 are in condition for allowance. If the Examiner believes a telephone conference would expedite or assist in the allowance of the present application, the Examiner is invited to call Erik Metzger, attorney for Applicant, at (512) 732-3922.

If there are additional fees due, please charge them to our Deposit Account No. 02-2666.

Respectfully submitted,

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